

Engineers & Scientists Environmental Services Waste Management Water Resources Site Development Special Structures Geotechnical Analysis

June 14, 1989 60251

Mr. Robert E. Swale, Remedial Project Manager
Mail Code 5HS-11
United States Environmental Protection Agency, Region V
230 South Dearborn Street
Chicago, Illinois 60604

RE: Response to U.S. EPA Comments on American Chemical Services Site Health and Safety Plan

Dear Mr. Swale:

Please find enclosed a copy of the site specific Health and Safety Plan for the RI/FS at the American Chemical Services, Griffith, Indiana site as submitted by Warzyn Engineering, Inc. (Warzyn). The copy includes changes initiated in response to recommendations listed in your letter dated May 30, 1989, as well as additional changes requested by Warzyn.

The additional submitted changes, for the most part, reflect the further review of the original Health and Safety Plan by Warzyn management based on practical site information gathered from several sources including site visits. There were several other changes which represent corrections of some typographical errors noticed during incorporation of U.S. EPA recommended changes. The changes made by Warzyn have been marked on this copy to facilitate agency review.

Given the specific procedures in place for detection of hydrogen cyanide, only the presence of significant levels of vinyl chloride could reasonably justify the 5 ppm action level for Level "B" implementations as given in the original plan. The requested changes, which would alter operational procedures, concern a more realistic evaluation of the potential for vinyl chloride exposures versus the expectance of higher concentrations of certain other volatile organic compounds. Warzyn is of the opinion that implementation of these modifications would more than adequately protect project personnel from exposure to vinyl chloride as well as other VOCs without the

necessity of restricting the performance of several project tasks to Level "B". This approach will be adequately protective, as well as expedite completion of sites tasks on a realistic schedule.

If you have any questions or comments on these requests and responses to your recommendations, please feel free to contact myself or alternate Warzyn personnel at (312) 773-8484.

Sincerely,

WARZYN ENGINEERING INC.

Leon A. Matejka Environmental Specialist

Peter J. Vagt, Ph.D.

Project Manager

[WP3] 251L13LAM/dms/PJV





Warzyn Engineering, Inc. Hamilton Lakes One Pierce Place Suite 1110 Illinois 60143-2681 (312) 773-8484

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